



December 17, 2004

Mr. Tim Hall
California Integrated Waste Management Board
1001 "I" Street
Sacramento, CA 95814
timothyh@ciwmb.ca.gov

**Re: CalEPA Environmental Justice Action Plan:
Precautionary Approach**

Dear Mr. Hall:

Thank you for the opportunity to provide comment on the definition of precautionary approaches in CalEPA's Environmental Justice Action Plan.

The Industrial Environmental Association has been an active participant during the past couple of years in CalEPA's environmental justice considerations, including serve on the Air Resources Board's Environmental Justice Stakeholders Group and participating in EJ Advisory Panel meetings and the Interagency Working Group.

We are concerned with the potential for too broad of application of precautionary approaches without clear definition.

IEA is supportive of the statement as contained in the document from the U.S. Commission on Ocean Policy entitled "A Framework for the Application of Precaution in Science-Based Decision Making about Risk" as definition which reads as follows:

"Precautionary approach means the application of judicious and responsible decision making based on best available science and on the weighing of the level of scientific uncertainty and the potential risk of damage. A precautionary approach is based on the recognition that the absence of full scientific certainty shall not be used as a reason for postponing decisions where there is a risk of serious or irreversible harm."

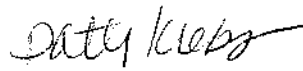


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We also believe it is important to note that CalEPA's Advisory Committee on Environmental Justice has already recognized that the BDOs use a precautionary approach in many of their programs.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Patti Krebs", with a stylized flourish at the end.

Patti Krebs
Executive Director